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JAN 31 2022

Charles A. Lawson # 48710

Cumberland County Department of
54 West Broad ST.

Bridgeton, New Jersey 08302

AT 8:30 M
WILLIAM T. WALSH
CLERK

Lawson v. Cumberland County Board of Freeholders et
Civil Docket # 1:21-CV-0039 NLH AMD

Civil Docket # 1:21-CV-03125-NLH

Civil Docket # 1:20-CV-15705-RBK-JS LAWSON

RE: Supplemental Claim To be Attributed To ALL
District Court civil Dockets Pending

CEG, Prison Official, John Does in Their

Individual and Official Capacity and already

Named Defendants: Captain Jones independent/
Official capacity

CEG Health System LLC, John Does.

Prison Officials, Currently named defendants in
Their individual and official capacity continue
to put my health, safety and life in danger
violating my 8th and 14th Amendment Rights.

"CEG Health System LLC staff are liable
of deliberate indifference consciously disregarding
my health, mental and physical health, by actions
causing harm. My best interest and rights are
being violated.

More specifically on November 2021

the Cumberland County's Medical Department was contacted by plaintiff via medical request.

I requested a blood test and physical exam to check for potential health problems since I have been incarcerated, and contracted covid-19 November 7, 2020.

Let the record reflect plaintiff has been detained by the court since July 4, 2020 and had no existing health issues. Out of concern that my health condition may have been compromised due to the jails living conditions at the time, plaintiff sought medical attention more specifically bloodwork and urine analysis to determine if plaintiff had diabetes, cancer, high blood pressure etc.

Blood was taken on 9/14/21, Plaintiff was informed that he would be contacted in a couple weeks when the results came back. Months later approx. 3 months after several request and confrontation, Plaintiff was informed Quote; "NO NEWS IS GOOD NEWS" Plaintiff demanded proper knowledge, procedure, and protocol in terms of obtaining blood analysis results. All to no avail, months of complaining and requesting my lab results plaintiff was seen November 15, 2021 and was informed about his

bloodwork that was available weeks after I had taken it according to medical examiner who disclose plaintiff bloodwork results. It was conveyed that not only was the results available and accessible months prior but "bad" cholesterol level had doubled since their is good and bad cholesterol according to medical examiner, and I should have been informed. I told her about the responses I was getting "No News is Good News" and she stated that not only was that the most ridiculous thing said but was detrimental to my health. I was prescribed Crestor 10mg. This professional negligence, malpractice subsequent negligence, and negligent hiring is unacceptable CFG is liable of negligent hiring and gross negligence by allowing unqualified or uncaring in term of work ethics and oath and license by the state, performing subpar without warning, reprimand, correction or termination of employment. Negligent is gross since precautions to be taken against harm are very simple such as persons educated and trained as such department should be endowed with physical and mental capabilities. Not informing plaintiff who sought medical attention on his own ~~conscience~~ behalf in the first place, put plaintiff

in a compromised position with a heightened risk for potential health problems or worse. This decision to not inform plaintiff who sought medical attention through proper channels exhausted, was willful, wanton, and reckless misconduct. CEG inpatient negligence put me in grave danger to be subjected to the CEG Medical Staff reckless conduct that expose me to extreme danger or injury or to imminent danger.

Atkinson v. Taylor 3rd Circuit case clearly establishes that a prison official with deliberate indifference exposes an inmate to levels of toxic substance that pose unreasonable risk of harm to his future health, in this case (high cholesterol,) violates the 8th Amendment. Plaintiff was denied medical care because they knew of my need for medical treatment and refuse to provide it by ignoring plaintiff's request for blood results whereas plaintiff could combat or address his medical needs accordingly in this case medication and or exercise and diet to prevent heightened risk of health complications; 2) 6 months before getting back to plaintiff with blood results was unreasonable, unexcusable and detrimental to plaintiff's health 3)

3) continue - The delay prevented plaintiff from reducing cholesterol levels heightening the potential risk of irreversible damages or even death.

August 30, 2021 Officer Dawkins said we were going outside for recreation. The jail deliberately put the 3rd Floor Negative Covid inmates in contact with 1st Floor positive covid inmates by calling Rec. Movement and leaving the exit door to the outside Rec yard locked intentionally creating a potential risk of exposure and contraction of covid, through spread. more specifically almost 15 minutes trapped on the first floor (dormitory setting) unable to return to our unit and unable to go outside. At least 14 to 20 inmates trapped on the walkway on the first floor which were Quarantine for positive covid inmates, failing to cohort, social distancing pursuant to CDC Guideline placing myself and others similarly situated in grave danger.

September 5, 2021 Officer Tarado worked the first floor contaminated unit (positive Covid-19 inmates) A and B dorm and simultaneously worked on the

3rd Floor who was negative covid (housed inmates, without PPE Gear with deliberate indifference. Conscious disregard to myself and others interest, rights, health and life was reckless. Six days later September 11, 2021 5 inmates tested positive in E dorm 3rd Floor

1. Hector Rios 2. Deshane Mack
3. Calvin Moore 4. Edward Fineizer
5. Victor Rodrowicz: None of these inmates upon returning from Quarantine was issued new towels, bed spread, covers or had any laundry done to refine themselves or their property.

ON 9/21/2021 We All tested negative in E dorm 3rd Floor and were awaiting clearance from administration

ON 9/23/2021 we were taken off quarantine.

ON 9/25/2021 A Few days later they brought an inmate Dustin Hiles failing to exchange his issue or cleaning his issue like they did the Forementioned 5 inmates. Officer Collazo did the right thing and took him to get all new issue And everyone tested again negative.

October 1 2021 Sgt Gavan informed me that I could not be moved to A pod setting stating I was Quote "UNTOUCHABLE" and I could not be moved and that I was restricted to limited movement. I am 81 years old and I am housed with men half my age. I am a great candidate to be in the pods but do to retaliation of the civil complaint plaintiff filed.

I saw Captain Jaynes At the nurse station and requested to be placed in the pods and he stated "Nigger Don't nobody move when you say move."

I was later informed by LT. Russell that I was "UNTOUCHABLE" as well, but he did further elaborate to tell me that The reason I am not to be moved per Captain Jaynes is because they didn't want me and Todd Ford who is a headliner along with Raymond Lamar Brown, to be together because we would create more trouble in the jail by communicating with the district court.

Captain Innes is liable for violating my 14th Amendment right Equal Protection Discrimination that is offensive or objectional because it involves prejudice or stereotyping. Calling me a Nigger is an act of Reverse discrimination as well as viewpoint discrimination based on the certain views I have openly expressed on the matter of the the Cumberland Cnty Dept. of Corrections Failure to adopt a CDC base policy, blatant lies and cover ups facilitated by the some officer in the facility reckless disregard for inmates safety, diet, health, law library access which is Access to the courts and plaintiff's Communication to the United States District Court. Restricting my views and ideas and reserving his right to speak on such matters or invoking his 5th Amendment Right to remain silent. Keeping me in a dormitory setting, more exposure to variants at my age out of spite and retaliation. I am ~~not~~ in a B dorm again, since December 2021 til present. Shuffling me from Floor to

to floor but failing to move me to C pod in 18 months, when room was available, and limiting my access to law library is violation of my Right of Due Process.

For Good Cause Shaun

I would like the courts to implement this supplemental claim as well as adding Captain Jones to Civil claim.

Certification 1:4 I Charles Lawson solemnly swear that the statements made by me are true to the best of my knowledge and if I have knowingly falsified any statements thereof I am subject to punishment, cert in lieu of oath.

respectfully submitted
Charles A. Lawson
In Propra Persona
C/O CHARLES A. LAWSON



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